

# MEMORANDUM

## Attorney Work Product

**TO:** Peter Moyers  
**Federal Defender Services of Wisconsin, Inc.**

**FROM:** Chad Tetting  
**Attoe-Watson & Company, Inc.**

**RE:** U.S. v. Raymond K. Brown

**DATE:** October 17, 2017

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This file originated in our office on September 27, 2017. On that date you requested that I verify previous employers of Raymond K. Brown. To facilitate this you provided me with a hand written list which you obtained from Mr. Brown as well as a signed authorization and release form.

Mr. Brown indicated that he worked at the Culver's on North Main Street in Rockford, Illinois from September 2010 until October 2012. There is not a Culver's located on North Main Street in Rockford. It is located at 1224 Benington Road. Staff there told me that I would need to contact the Human Resources Manager for D J Properties, LLC, the owner of the franchise. Nicole Welte, the HR Manager reports that Mr. Brown was actually employed by their company from 12/10/2013 to 12/31/2014. She stated that it is their policy to provide dates of employment only. Her email is attached for your review.

Mr. Brown indicated that he was employed at the Steak N' Shake restaurant located on East State Street in Rockford, Illinois from November 2012 to December of 2014. Management there explained that they outsource employment verification to a company called CCCVerify.com. I created an account with this company and received verification that Mr. Brown was employed at that Steak N. Shake location from 02/03/2015 to 04/14/2016. Their report is attached for your review.

Mr. Brown indicated that he was employed by Taco Bell on East State Street in Rockford, Illinois from March 2014 – June 2014. I spoke with Tim the current manager there at (815) 398-6644. He stated that he did not have an employee file for Mr. Brown and no one currently working there was there in 2014.

Mr. Brown indicated that he was employed by Furst Staffing in Rockford, Illinois from July 2014 to October 2014. Their HR Manager Sarah confirmed that he was employed by their company from 07/14/2014 to 07/21/2014 only. She stated that it is their policy to provide dates of employment only. For your future reference, her telephone number is (815) 229-7810.

Mr. Brown indicated that he worked at Little Ceasar's on Cranston Road in Beloit from January 2015 to February 2016. I spoke with the current manager there, Curtis Ingle, who verified that those dates sounded correct. He stated that he had nothing further to share about Mr. Brown. For your future reference, the telephone number there is (608) 362-8228.

Mr. Brown indicated that he was employed at Arby's located on Cranston Road in Beloit, Wisconsin from April 2016 to April 2017. There is no Arby's location on Cranston Road in Beloit. There is one located at 2850 Milwaukee Road in Beloit. I contacted Lacy the current manager there. She stated that their company has outsourced employment verifications to a company called theworknumber.com, a subsidiary of Equifax. I applied for access to this service. To date, I have not received approval for access and I could not identify a telephone number to follow up on the status of my application. I will notify you if / when I receive something from them.

(CJT)

The information displayed below is an official and authentic employment verification report generated from CCCVerify.com. This verification is system-generated with data provided by the employer directly and is the only information available. This employment record displays payroll information based on the week in which the wages were earned and not the date on which the employee was paid. Any discrepancies between the YTD figures displayed below and the employee's W-2 are a result of reporting dates. (For example, earnings on this report displayed as w/e 12/31, may be reported in the next calendar year on the W-2.)

## Verification of Employment

Report Tracking Number: 890113

Date Reported: 10/16/2017

## Employer

Name: STEAK N' SHAKE - 0220 - ROCKFORD, IL

Division:

Address:

## Employee

First Name:	RAYMOND	Last Name:	BROWN
Employee ID:		Work Site:	0220 - ROCKFORD, IL
First Hire Date:	02/03/2015	First Separation Date:	03/05/2016
Most Recent Hire Date:	02/03/2015	Most Recent Separation Date:	04/14/2016
		Total Time Worked	Years: 1 Months: 2
Work Status:	INACTIVE	Employment Type:	
Job Title:	PRODUCTION		